

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

R. Alexander Pilmer
To Call Writer Directly:
(213) 680-8405
alex.pilmer@kirkland.com

333 South Hope Street
Los Angeles, California 90071

(213) 680-8400

www.kirkland.com

Facsimile:
(213) 680-8500

June 18, 2015

Via ECF

The Honorable Denise L. Cote
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: Request to File Under Seal

NCUA v. RBS Securities Inc. et al., No. 11-02340 (D. Kan.)

NCUA v. RBS Securities Inc. et al., No. 11-05887 (C.D. Cal.)

NCUA v. Morgan Stanley & Co. et al., No. 13-06705 (S.D.N.Y.)

Dear Judge Cote:

RBS filed today a letter motion to compel additional U.S. Central depositions in the above-captioned matters. A list of exhibits to that motion, which RBS seeks permission to file under seal, is attached hereto. Exhibits A through J to that motion were designated Confidential by Plaintiff pursuant to the Master Protective Order (ECF No. 102)¹ entered in these matters. Exhibit K is an email string between counsel for RBS and counsel for Plaintiff that references discovery material designated Confidential by Plaintiff pursuant to the Master Protective Order. Paragraph 9 of the Master Protective Order provides:

In the event that before trial in the Related Actions, or in connection with any hearing in or any matter relating to the Related Actions, counsel for any Party determines to file or submit in writing to the Clerk's office any Protected Material, or any papers containing or making reference to the substance of such material or information, such documents or portions thereof containing or making reference to such material or information shall be filed with a request that the documents be filed under seal in accordance with the rules of the Court, and kept under seal until further order of the Court.

¹ All ECF references are to *NCUA v. RBS Securities Inc.*, No. 13-06726 (S.D.N.Y.).

KIRKLAND & ELLIS LLP

In accordance with Rule 4(A) of the Court's Individual Practices in Civil Cases, and Paragraph 9 of the Master Protective Order, RBS requests that Exhibits A through K to its letter motion be filed under seal in accordance with the rules of the Court, and kept under seal until further order of the Court.

Very truly yours,

/s/ R. Alexander Pilmer

R. Alexander Pilmer

cc: Counsel of Record (via ECF)

KIRKLAND & ELLIS LLP

Documents Requested To Be Filed Under Seal

Exhibit A	Plaintiffs' Amended Responses to Defendants' First Set of Joint Interrogatories
Exhibit B	NCUA-USC-0000156164
Exhibit C	NCUA-USC-0000193197
Exhibit D	NCUA-USC-0000152375
Exhibit E	NCUA-USC-0000152680
Exhibit F	NCUA-USC-0000498455
Exhibit G	NCUA-USC-0000279585
Exhibit H	NCUA-USC-0010074402
Exhibit I	Excerpted deposition testimony of Connie Loveless
Exhibit J	NCUA-USC-0010559121
Exhibit K	Email correspondence between counsel for RBS and counsel for Plaintiff